

No. 19-1087

IN THE
Supreme Court of the United States

CHARLES M. HALLINAN,

Petitioner,

v.

UNITED STATES OF AMERICA,

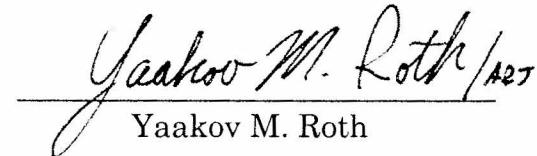
Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief for *Amicus Curiae* National Association of Criminal Defense Lawyers in Support of Petitioner in *Hallinan v. United States*, No. 19-1087, complies with the word limitations, as it contains 3,142 words.

I declare under penalty of perjury that the foregoing is true and correct.

Date: March 18, 2020



Yaakov M. Roth